

1 **PAUL A. LEVIN (State Bar No. 229077)**
2 **MORTGAGE RECOVERY LAW GROUP LLP**
3 **550 North Brand Boulevard, Suite 1100**
4 **Glendale, California 91203**
5 **TELEPHONE: (818) 630-7900 FACSIMILE: (818) 630-7920**
6 **EMAIL: plevin@themrlg.com**

7 **ETAN MARK (admitted *pro hac*)**
8 **DONALD J. HAYDEN (admitted *pro hac*)**
9 **MARK MIGDAL & HAYDEN**
10 **80 SW 8th Street, Suite 1999**
11 **Miami, Florida 33130**
12 **TELEPHONE: (305) 374-0440**
13 **EMAIL: etan@markmigdal.com**
14 **don@markmigdal.com**

15 *Attorneys for Plaintiffs*

16 **UNITED STATES DISTRICT COURT**

17 **CENTRAL DISTRICT OF CALIFORNIA, WESTERN DIVISION**

18 **MICHAEL LAVIGNE, *et al.*,**
19 **Plaintiffs,**

20 **vs.**

21 **HERBALIFE LTD., *et al.*,**
22 **Defendants.**

CASE NO. 2:18-cv-07480-JAK (MRWx)
[Related Case 2:13-cv-02488-BRO-RZ]

JOINT REPORT ON SETTLEMENT

Assigned to Hon. John A. Kronstadt,
Courtroom 10B

1 Plaintiffs Patricia Rodgers, Izaar Valdez, and Jennifer Ribalta (collectively
2 referred to as “Plaintiffs”) and Defendant Herbalife International of America, Inc.
3 (“Herbalife”), hereby submit the following Joint Report on Settlement Talks, and
4 state the following:
5

- 6 1. On August 17, 2020, Plaintiffs and Herbalife attended mediation with
7 the Honorable Suzanne Segal.
8
- 9 2. Efforts were made to resolve both the above-captioned action and the
10 related action of *Rodgers et al. v. Mark Addy, et al.*, pending in the
11 United States District Court for the Southern District of Florida, Case
12 No. 17-CV-23429-MGC. The Florida Defendants did not participate in
13 the mediation.
14
- 15 3. The parties reached an impasse.
16
17
18
19
20
21
22
23
24
25
26
27
28

1 DATED: August 19, 2020

Respectfully submitted,

2 Etan Mark

3 Mark Migdal & Hayden

4 By: /s/ Etan Mark

5
6 Attorneys for Plaintiffs Jeff Rodgers,
7 Patricia Rodgers, Jennifer Ribalta, and Izaar
8 Valdez

9 DATED: August 19, 2020

Mark T. Dooks

10 Paul S. Chan

11 Gopi K. Panchapakesan

Jonathan M. Jackson

12 Bird, Marella, Boxer, Wolpert, Nessim, Dooks,
13 Lucenberg & Rhow, P.C.

14 By: /s/ Jonathan Jackson

15 Attorneys for Defendant Herbalife
16 International of America, Inc.

SERVICE LIST

Mark T. Drooks, Esq.
mdrooks@birdmarella.com
Paul S. Chan, Esq.
pchan@birdmarella.com
Gopi K. Panchapakesan, Esq.
gpanchapakesan@birdmarella.com
BIRD, MARELLA, BOXER, WOLPERT
NESSIM, DROOKS, LINCENBERG & RHOW, P.C.
1875 Century Park East, 23rd Floor
Los Angeles, California 90067-2561
Telephone: (310) 201-2100
Facsimile: (310) 201-2110

Attorneys for and Herbalife International of America, Inc.

Michael S. Catlett, Esq.
michael.catlett@quarles.com
Edward A. Salanga, Esq.
edward.salanga@quarles.com
Kevin D. Quigley, Esq.
kevin.quigley@quarles.com
Brian A. Howie, Esq.
brian.howie@quarles.com
Zachary Scott Foster, Esq.
zachary.foster@quarles.com
QUARLES & BRADY LLP
One Renaissance Square
Two North Central Avenue
Phoenix, AZ 85004-2391
Telephone: (606) 229-5200

Attorneys for Florida Defendants